

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the
DEPARTMENT OF STATE, ET AL.,

Defendants.

CIVIL ACTION
CASE NO. 1:25-cv-10685-WGY

**MOTION FOR LEAVE TO FILE REPLY BRIEF
BY PROPOSED INTERVENORS THE INTERCEPT
AND THE CENTER FOR INVESTIGATIVE REPORTING**

In accordance with Local Rule 7.1(b)(3), Intercept Media, Inc. and The Center for Investigative Reporting, Inc. (collectively, “Proposed Intervenor”) seek leave to file the attached reply brief, which is less than five pages, in support of their Motion to Intervene and for Access to Judicial Records, ECF Nos. 288, 289. Defendants do not consent to this motion for leave.

Defendants’ response to Proposed Intervenor’s Motion was filed on December 12, 2025. Proposed Intervenor respectfully submit that this additional briefing will assist the Court in resolving the pending Motion by allowing Proposed Intervenor to reply concisely to assertions about this case’s procedural history and to legal arguments raised for the first time in Defendants’ response.

Respectfully submitted,

INTERCEPT MEDIA, INC. and
THE CENTER FOR INVESTIGATIVE
REPORTING, INC.

By their attorneys,

December 19, 2025

/s/ Robert A. Bertsche

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: December 19, 2025

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